

## REMARKS

Claims 33-60 remain in the present application. Applicants respectfully request further examination and reconsideration of the rejections based on the arguments set forth below.

### Claim Rejections – 35 U.S.C. §103

Claims 33-60 are rejected in the present Office Action under 35 U.S.C. §103(a) as being unpatentable over United States Patent Application Publication Number 2004/0048503 by Mills et al. (hereafter referred to as “Mills”) in view of United States Patent Number 6,442,570 to Wu (hereafter referred to as “Wu”). Applicants have reviewed the cited references and respectfully submit that the embodiments of the present invention as recited in Claims 1-3 and 17-18 are not rendered obvious by Mills in view of Wu for the following reasons.

Applicants respectfully direct the Examiner to independent Claim 33 that recites a method of copying files comprises (emphasis added):

displaying a plurality of location identifiers comprising a location identifier of a removable memory, said removable memory detachably coupled to a portable electronic device;  
in response to a selection of a file to copy to said removable memory, associating said location identifier of said removable memory with said file; and  
in response to said associating, automatically copying said file to said removable memory.

Independent Claims 39, 45, 51 and 56 recite limitations similar to independent Claim 33. Claims 34-38, 40-44, 46-50, 52-55 and 57-60 depend from their respective independent Claims and recite further limitations to the claimed invention.

Applicants respectfully submit that Mills fails to teach or suggest the limitations of “in response to a selection of a file to copy to said removable

memory, associating said location identifier of said removable memory with said file" as recited in independent Claim 33. As recited and described in the present application, in response to a selection of a file to copy to a removable memory, a location identifier of the removable memory is associated with the file.

In contrast to the claimed embodiments, Applicants understand Mills to teach merely that digitally encoded media is stored to a removable memory (paragraph 46). However, Applicants respectfully submit that mere storing of information on a removable memory does not amount to associating a location identifier of a removable memory with a file as claimed. Further, Applicants respectfully submit that a mere storing of information does not amount to associating a location identifier of a removable memory with a file *in response to a selection of the file to copy to the removable memory* as claimed. As such, Applicants reiterate that Mills fails to teach or suggest the limitations of "in response to a selection of a file to copy to said removable memory, associating said location identifier of said removable memory with said file" as recited in independent Claim 33.

Applicants respectfully submit that Wu, either alone or in combination with Mills, fails to cure the deficiencies of Mills discussed above with respect to independent Claim 33. Specifically, Wu fails to teach or suggest the limitations of "in response to a selection of a file to copy to said removable memory, associating said location identifier of said removable memory with said file" as recited in independent Claim 33.

Applicants respectfully submit that Mills fails to teach or suggest the limitations of "in response to said associating, automatically copying said file to

said removable memory” as recited in independent Claim 33. As recited and described in the present application, in response to associating a location identifier of a removable memory with a file, the file is automatically copied to the removable memory.

In contrast to the claimed embodiments, Applicants understand Mills to teach merely that digitally encoded media is stored to a removable memory (paragraph 46). However, Applicants respectfully submit that mere storing of information on a removable memory does not amount to *automatically* copying a file to a removable memory as claimed. Further, Applicants respectfully submit that a mere storing of information does not amount to automatically copying a file to a removable memory *in response to associating a location identifier of the removable memory with the file* as claimed. As such, Applicants reiterate that Mills fails to teach or suggest the limitations of “in response to said associating, automatically copying said file to said removable memory” as recited in independent Claim 33.

Applicants respectfully submit that Wu, either alone or in combination with Mills, fails to cure the deficiencies of Mills discussed above with respect to independent Claim 33. Specifically, Wu fails to teach or suggest the limitations of “in response to said associating, automatically copying said file to said removable memory” as recited in independent Claim 33.

Page 2 of the rejection states that Mills fails to teach or suggest the limitations of “displaying a plurality of location identifiers comprising a location identifier of a removable memory” as recited in independent Claim 33.

Applicants concur.

Applicants respectfully submit that Wu, either alone or in combination with Mills, also fails to teach or suggest the limitations of “displaying a plurality of location identifiers comprising a location identifier of a removable memory” as recited in independent Claim 33. As recited and described in the present application, a plurality of location identifiers comprising a location identifier of a removable memory are displayed.

In contrast to the claimed embodiments, Applicants fail to find any teaching or suggestion in Wu of a location identifier which is displayed. Although Wu teaches globally unique identifiers (GUIDs) for storage volumes, and assuming arguendo that a GUID is analogous to a location identifier as claimed, Wu fails to teach or suggest that the GUID is displayed. As such, Applicants reiterate that Wu fails to teach or suggest the limitations of “displaying a plurality of location identifiers comprising a location identifier of a removable memory” as recited in independent Claim 33.

For these reasons, Applicants respectfully submit that independent Claim 33 is not rendered obvious by Mills in view of Wu, thereby overcoming the 35 U.S.C. §103(a) rejection of record. Since independent Claims 39, 45, 51 and 56 recite limitations similar to those discussed above with respect to independent Claim 33, independent Claims 39, 45, 51 and 56 also overcome the 35 U.S.C. §103(a) rejections of record. Since dependent Claims 34-38, 40-44, 46-50, 52-55 and 57-60 recite further limitations to the invention claimed in their respective independent Claims, dependent Claims 34-38, 40-44, 46-50, 52-55 and 57-60 are also not rendered obvious by Mills in view of Wu. Therefore, Claims 33-60 are allowable.

CONCLUSION

Applicants respectfully submit that Claims 33-60 are in condition for allowance and Applicants earnestly solicit such action from the Examiner.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 50-4160.

Respectfully submitted,

MURABITO, HAO & BARNES LLP

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BMF

Bryan M. Failing  
Registration No. 57,974

Two North Market Street  
Third Floor  
San Jose, CA 95113  
(408) 938-9060